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Administrator
U.S. Environmental Protection Agency
Ariel Rios Building
Room 3000, #1101-A
1200 Pennsylvania Avenue N.W.
Washington, D.C. 20460

January 25, 2008

Dear Administrator:

On behalf of the Flavor and Fragrance High Production Volume Consortia, I wish to thank the Environmental Protection Agency (EPA) for their comments on the test plan and robust summaries on "Alicyclic Aldehydes-HMPCC". HMPCC is an acronym for 3 and 4-(4-Hydroxy-4-methylpentyl)-3-cyclohexene-1-carboxaldehyde (lyral), CAS No. 31906-04-4.

The Alicyclic Aldehyde Consortium, as a member of FFHPVC, serves as an industry consortium to coordinate testing activities for chemical substances under the Chemical Right-to-Know Program. Since 1999, the companies that are current members of the Consortium have supported the collection and review of available test data, development of test plans and robust summaries, and conducted additional testing for HMPCC.

Based on our initial recommendations for testing and the peer-reviewed comments of the EPA, the Alicyclic Aldehyde Consortium of the Flavor and Fragrance High Production Volume Consortia (FFHPVC) is pleased to submit the following revised test plan and robust summaries for HMPCC. The revised test plan and robust summaries contain additional data on existing studies and the results of additional studies on ecotoxicity, toxicity, physiochemical properties and environmental fate that are related to the questions and comments made by the EPA in its letter dated 7/1/2003. This letter contains responses to the specific comments made by the EPA. These responses taken together with the inclusion of new study data and other information constitute the key changes to the original test plan and robust summaries.

Based on these additional data, the Alicyclic Aldehyde Consortium concludes that the current test plan and robust summaries for this category is now complete. The experimental and model data for

physiochemical properties, environmental fate, ecotoxicity, and human health endpoints are consistent and provide a comprehensive basis upon which to evaluate the hazard potential of 3- and 4-(4-hydroxy-4-methylpentyl)-3-cyclohexene-1-carboxaldehyde. A summary of the key hazard data for HMPCC has been included in this letter (see Table 1).

We consider that the test plan and robust summaries for this category are final and have no plans to provide additional data. The EPA comprehensive comments provided the necessary guidance to complete the test plan for this category. The collaboration between the Alicyclic Aldehyde Consortium and the Environmental Protection Agency in the Chemical "Right to Know" Program has produced a hazard database that will be useful to the public for decades to come. Thank you for the opportunity to participate in such a program.

If you have any questions or comments concerning the contents of this letter, please feel free to contact me at any time (202-331-2325) or tadams@therobertsgroup.net.

Best regards,

Timothy B. Adams, Ph.D.

Technical Contact Person for FFHPVC